

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA**

In re: Baycol Products Litigation

UNITED STATES OF AMERICA *ex rel.*
LAURIE SIMPSON,

Honorable Michael J. Davis
United States District Court Judge

Plaintiff,

v.

BAYER HEALTHCARE
PHARMACEUTICALS, INC.;
BAYER CORP.; and
BAYER A.G.,

MDL No. 1431
Civil No. 08-5758(MJD)(SER)

Defendants.

JOINT STATUS REPORT

In accordance with the Court’s January 18, 2019 Order (ECF No. 178), Relator Laurie Simpson (“Relator”) and Defendants Bayer Healthcare Pharmaceuticals, Inc., Bayer Corp., and Bayer A.G. (“Bayer”) (together, the “Parties”), respectfully submit the following joint status report.

Since the last Joint Status Report on August 20, 2019, the Parties have continued to make progress regarding discovery. Specifically, Bayer served its First Request for Production of Documents on Relator on August 21, 2019. In addition, Bayer has been reviewing documents that are potentially responsive to Relator’s Second Request for Production and plans to make a substantial production of documents from six custodians by October 2, 2019.

At this time, the Parties do not believe that there are any discovery issues that require the Court’s intervention. The Parties are available if the Court wishes to discuss the status of discovery

at the conference scheduled for September 24, 2019. But in light of the foregoing, the Parties believe that the status conference may be postponed until October 22, 2019.

Dated: September 17, 2019

Respectfully submitted,

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Bayer Healthcare Pharmaceuticals, Inc.*

CERTIFICATE OF SERVICE

I certify that on September 17, 2019, the foregoing document was served this day on all counsel of record via CM/ECF.

/s/ Asher Alavi